

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

AMENDED DEFENDANT'S WITNESS LIST

ALI BAHAR v. CITY OF CINCINNATI

Case No. C-1-01-798

PRESIDING JUDGE

Wm.BERTELSMAN

PLAINTIFF'S ATTORNEYS

KELLY MULLOY MYERS
RANDOLPH FREKING

DEFENDANT'S ATTORNEYS

AUGUSTINE GIGLIO
TERRENCE NESTOR

TRIAL DATE(S)

	WITNESS NAME	DESCRIPTION OF EXPECTED TESTIMONY
	Robert Campbell, Deputy Director, MSD	Mr. Campbell has information regarding matters at issue in this litigation. Mr. Campbell's testimony will include, but is not limited to the claims of discrimination made by the Plaintiff, his job classifications, performance, MSD procedures and Plaintiff's actions resulting in a written reprimand. Mr. Campbell will also testify as to matters testified in his deposition.
	Patrick Karney, Director, MSD	Mr. Karney has information regarding matters at issue in this litigation. Mr. Karney's testimony will include, but not limited to the claims of discrimination made by the Plaintiff, his job classifications, performance, MSD procedures and Plaintiff's actions resulting in a written reprimand. Mr. Karney will also testify as to matters testified in his deposition.
	Julia Johnson, MSD, HR	Ms. Johnson will address Plaintiff's classification requirements, pay and other benefits received by Plaintiff and Disciplinary and Human Resources procedures within MSD. Ms. Johnson will also testify as to matters testified in his deposition.
	Steve Minges, Supervisor, MSD, Wastewater Collections	Mr. Minges will address the allegations of Plaintiff regarding his assignment to and the nature of operations in Waste Water Collections. Mr. Minges will also testify as to matters testified in his deposition.
	Tom Quinn, Former Director, MSD	Mr. Quinn will address procedures for obtaining additional funds for Projects during his term as Director and obtainment procedures for additional funds on contracts. Mr. Quinn will also testify as to matters

	WITNESS NAME	DESCRIPTION OF EXPECTED TESTIMONY
		testified in his deposition.
	Kevin Shepard, Former Director, Facility Management	Mr. Shepard will testify as to his decision in selecting to fill the vacant position of Facility's Manager in 2001. Mr. Shepard will also testify as to matters testified in his deposition.
	Jerry Wiemer, Supervisor, Wastewater Collections	As Plaintiff's supervisor, Mr. Wiemer will testify regarding Plaintiff's duties and work as CET-4 at Wastewater Collections. Mr. Wiemer will also testify as to matters testified in his deposition.

	WITNESS NAME	DESCRIPTION OF EXPECTED TESTIMONY
	Ralph Johnstone, Supervisor, Wastewater Collections	As Plaintiff's supervisor, Mr. Johnstone will testify regarding Plaintiff's duties and work as CET-4 at Wastewater Collections. Mr. Johnstone will also testify as to matters testified in his deposition.
	Peter Schneider, Former Supervisor, MSD	Mr. Schneider will testify as to Plaintiff's claims and Defendant's defenses as well as procedures and Plaintiff's activities seeking to establish the Deputy Director as violating such standards. Mr. Schneider will also testify as to matters testified in his deposition.

Defendant reserves the right to call any witnesses listed by Plaintiff.

Respectfully submitted,

J. RITA MCNEIL (0043535)
City Solicitor

/s Augustine Giglio
Augustine Giglio (0031911)
Terry Nestor (0065840)
Trial Attorneys for Defendant
Assistant City Solicitors
City Hall, Room 214
Cincinnati, OH 45202
(513) 352-3334
fax: 352-1515

CERTIFICATE OF SERVICE

I hereby certify that on November 8^h, 2004 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Kelly Mulloy Myers, counsel for Plaintiff, Freking & Betz, 215 East Ninth Street, Fifth Floor, Cincinnati, Ohio 45202 .

s\ Augustine Giglio
Augustine Giglio (0031911)
Assistant City Solicitor
Attorney for Defendant
Room 214, City Hall
801 Plum Street
Cincinnati, Ohio 45202
(513) 352-3339
Fax: (513) 352-1515
e-mail: gus.giglio@cincinnati-oh.gov